

Message

From: Lundelius, Diana [Lundelius.Diana@epa.gov]
Sent: 8/23/2018 3:02:21 PM
To: Brian Boyer [Ex. 6 Personal Privacy (PP)]@gmail.com]
CC: Hambrick, Amy [Hambrick.Amy@epa.gov]
Subject: RE: Controlling Air Pollution from the Oil and Natural Gas Industry - Reporting When NSPS OOOOa is Finalized

In Region 6, AR is the only state that has not accepted NSPS delegation for minor sources. NM is delegated, but does not have the resources to handle the volume of reports and notifications under NSPS OOOO/OOOOa. If you submit a report to CEDRI using the published templates, it will be available to EPA Region 6 and state reviewers, except AR, which is not using CEDRI at this time. I strongly advise contacting each state to get instructions for where to send other non-CEDRI reports and what formats are acceptable. Other NSPS OOOO/OOOOa reports and notifications that are NOT submitted via CEDRI should be sent directly to TCEQ, LDEQ, ADEQ, NMED and ODEQ. Additionally EPA Region 6 will continue to receive NSPS OOOO/OOOOa annual reports for NM and AR, and well completion notifications for NM using the CEDRI templates or company/state developed formats. Although we still continue to receive well notifications and reports for the other delegated states, it is not necessary to send courtesy copies for TX, LA, AR or OK well completion notifications to Region 6. Annual reports sent to Region 6 must be submitted electronically to R6WellCompletion@epa.gov. We are NOT accepting paper copies of NSPS OOOO/OOOOa reports, correspondence or notifications any longer. Report attachments should be 12 MB or less, submitted as pdf, jpg, xlsx, or docx formats. Please do not mark reports with Confidential headers or footers, or submit any confidential business information via email.

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Lean Six Sigma Black Belt
NSPS OOOO/OOOOa Coordinator
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"Courage is the willingness to proceed with positive change, even if the outcome is uncertain."
Connect with me on Linked In, <https://www.linkedin.com/in/diana-l-lundelius-chmm-a6b98917/>.

From: Hambrick, Amy
Sent: Thursday, August 23, 2018 9:09 AM
To: Brian Boyer <brianeboyer@gmail.com>
Cc: Lundelius, Diana <Lundelius.Diana@epa.gov>
Subject: RE: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Good morning Brian,

Great question, I will need to double check this but I am pretty sure the form would be "final" once the reconsideration is finalized (FR notice) and in turn the CEDRI page and form itself would be marked as "final" . Yes, if OK DEQ has delegation, then you would submit it to them. Please reach out to EPA Region 6 (Diana Lundelius) to connect with them

as well. I understand the beauty of CEDRI to be that it gives both states and EPA access to submitted forms. I hope this helps,

Amy

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Brian Boyer [<mailto:brianeboyer@gmail.com>]

Sent: Wednesday, August 22, 2018 3:13 PM

To: Hambrick, Amy <Hambrick.Amy@epa.gov>

Subject: Re: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Amy,

Thank you for the response.

Yes, makes sense.

Do you know what the mechanism that will be used to convey finalization? Federal register notice? Posting on website (requiring operators/consultants) to check the CEDRI site?

So if need to submit a NSPS OOOOa report for applicable facilities in Oklahoma, then must report to Oklahoma DEQ - I understand they have delegation for NSPS OOOOa.

If the draft Excel form and CEDRI is used (before finalized), would separate reports be due to USEPA and OKDEQ or would CEDRI submittal meet OKDEQ requirements?

Regards,

Brian E. Boyer

Environmental Consultant

BTGap, L.L.C.

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On Wed, Aug 22, 2018 at 2:01 PM Hambrick, Amy <Hambrick.Amy@epa.gov> wrote:

Hi Brian-

While the CEDRI template is still considered draft, the reports are required to be submitted- this can be done by submitting it to your delegated authority or through CEDRI. CEDRI is available to accept the 60.5420a(b) and 60.5422a(a) and (b) reports. Because EPA's template on the website you referenced is still considered "draft", the requirement to submit only through CEDRI is not triggered. Once the report is "final" then CEDRI reporting is mandatory. Hence, in the meantime, the report still must be submitted, but the vehicle to do that is either submit to delegated authority or through CEDRI. Make sense?

So from the reg text, once the [final] form has been available in CEDRI for 90 days, submittal through CEDRI is required. Up to this 90 day marker, submittal can be either CEDRI or the delegated authority. Excerpt from the reg text FYI:

“You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted.”

Furthermore, as you may know, after OOOOa was finalized in 2016, EPA received administrative petitions seeking reconsideration of various aspects of the 2016 NSPS. EPA sent letters to petitioners granting reconsideration on April 18, 2017 and on June 5, 2017, EPA issued a *Federal Register* notice granting reconsidering on additional requirements. When EPA proposes amendments to OOOOa and updates the reporting template, the public will have an opportunity to comment on the template to help make it better. Be sure to stay plugged in and submit your comments when the opportunity comes round.

I hope this helps.

Regards,

Amy Hambrick

U.S. Environmental Protection Agency

(919)541-0964

From: drupal_admin@epa.gov <drupal_admin@epa.gov> on behalf of Brian E Boyer via EPA <no-reply@epa.gov>
Sent: Thursday, August 16, 2018 2:13 PM
To: AirAction

Subject: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Submitted on 08/16/2018 2:13PM

Submitted values are:

Name: Brian E Boyer

Email Address: brianeboyer@gmail.com

Comments:

Do you have an anticipated date when the draft 60.5420a(b) Annual Report (Spreadsheet Template) will be finalized?

Asking this because I work as an environmental consultant to oil and gas operators and prepare NSPS OOOOa reports. Need to know if CEDRI and/or the EPA 60.5420a(b) Annual Report (Spreadsheet Template) will be required for the NSPS OOOOa report due to be submitted on or around October 30, 2018.

Brian Boyer

Environmental Consultant

BTGap, L.L.C.

337-356-9856